REMARKS

Claims 1-16 are pending. The Office Action dated October 3, 2003 in this Application has been carefully considered and the above amendments and the following remarks are presented in a sincere attempt to place this Application into allowance. Claims 1, 2, 7, 10, 11, and 12 have been amended in this Response. Reconsideration and allowance are respectfully requested in light of the above amendments and following remarks.

Independent Claims 2, 10, 12 have been amended to restore Claims 2, 10, and 12 to their original forms. Claims 2, 10, and 12 are dependent on Claims 1, 7 and 11, respectively, as originally filed. Applicants contend that the rationale underlying this amendment bears no more than a tangential relation to any equivalence in question because previous amendments to Claims 2, 10, and 12 were withdrawn with the current, foregoing amendment. *Festo Corp. v. Shoketsu Kinzoku Kogyo Kabushiki Co.*, 122 S.Ct. 1831 (2002).

Claims 1-16 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Publication No. 2001/0038612 A1 by Vaughn et al. ("Vaughn"). Insofar as they may be applied against the claims as amended, these rejections are traversed or are overcome, as appropriate.

Claim 1 stands rejected under 35 U.S.C. 102(b) as anticipated by Vaughn. Specifically, Vaughn was recited as assertedly fully disclosing the (1) grouping timing paths that share common characteristics, the (2) creating a list file containing the timing paths, the (3) searching a timing report for timing paths that match the timing paths in the list file, the (4) generating a first summary report on the timing paths in the input list, the first summary report listing the status of the timing paths, and the (5) determining whether there are new timing path(s) not found in the input list.

Rejected independent Claim 1 as now amended more particularly recites one of the distinguishing characteristics of the present invention, namely, "grouping timing paths, *wherein groupings are selected from the characteristics group consisting of* shared common *source, shared common direction, and shared path convergence*". Support for this Amendment can be found, among other places, page 2, line 27 to page 3, line 14 of the original Application.

Vaughn does not teach, disclose, or suggest grouping by common source, common direction, and common convergence. Instead, Vaughn, in paragraph [0124], teaches "routing pattern for connecting one pair of terminals is repeated in other pairs of terminals that share similar characteristics with the initial pair of terminals....Routing pattern emulation occurs when it is important to provide an exact length, similarly shaped, routing path between two terminals to preserve timing of signals by maintaining consistent and controlled propagation times along the circuit traces." However, there is no explicit mention of the specific grouping of paths for the purpose of improving the efficiency of analyzing a timing report as in amended Claim 1.

In view of the foregoing, it is apparent that the cited reference does not disclose, teach or suggest the unique combination now recited in amended Claim 1. It is therefore submitted that amended Claim 1 clearly and precisely distinguishes over the cited reference in a patentable sense, and is therefore allowable over this reference and the remaining references of record. Accordingly, it is respectfully requested that the rejection of Claim 1 under 35 U.S.C. § 102(b) as anticipated over Vaughn be withdrawn.

Claims 2, 3, 5, and 6 are dependent Claims that depend on and further limit amended Claim 1. Hence, for at least the aforementioned reasons, these Claims would be deemed to be in condition for allowance. Hence, it is respectfully requested that the rejections of the dependent Claims 2, 3, 5, and 6 also be withdrawn.

Claim 4 stands rejected under 35 U.S.C. 102(b) as anticipated by Vaughn. Specifically, Vaughn was recited as assertedly fully disclosing the (1) grouping timing paths that share common characteristics, the (2) creating a list file containing the timing paths, the (3) searching a timing report for timing paths that match the timing paths in the list file, the (4) generating a first summary report on the timing paths in the input list, the first summary report listing the status of the timing paths, the (5) determining whether there are new timing path(s) not found in the input list, and the (6) wherein, in the step of grouping timing paths that share common characteristics, wild cards are used to group the timing paths.

Insofar as this rejection may be applied against the Claim 4, this rejection is traversed. The Examiner stated on page 2 of the Office Action that Claim 4 "teaches the same method of claim 1 and is rejected in the same manner except: wherein, in the step of grouping timing paths that share common characteristics, wild cards are used to group the timing paths." The Examiner, though, does not disclose where in Vaughn the use of wild cards is taught, suggested, or disclosed. In fact, Vaughn does not teach, suggest, or disclose the use of wild card to group timing paths. The use of a wild card would allow for the fixing of all similar problems in the same way with minimal input by a user. For example, "a wild card such as '*' may be used on a latch bit to identify a load enable path problem on a 128-bit data latch." (Application, pg. 3, lines 5-6.) Hence, the rejection of Claim 4 under 35 U.S.C. 102(b) as anticipated by Vaughn is inappropriate.

In view of the foregoing, it is apparent that the cited reference does not disclose, teach or suggest the unique combination now recited in Claim 4. It is therefore submitted that Claim 4 clearly and precisely distinguishes over the cited reference in a patentable sense, and is therefore allowable over this reference and the remaining references of record. Accordingly, it is respectfully

requested that the rejection of Claim 4 under 35 U.S.C. § 102(b) as anticipated over Vaughn be withdrawn.

Claim 7 stands rejected under 35 U.S.C. §102(b) as anticipated over Vaughn. Applicant overcomes the rejection of Claim 7. Applicant contends that the rejection of amended Claim 7 is overcome for at least some of the reasons that the rejection of Claim 1 as amended is overcome. These reasons include Vaughn not disclosing, teaching, or suggesting "[a] computer program code for reading in a list file containing unique timing paths grouped from a plurality of timing paths grouping timing paths, *wherein the plurality of timing paths are selected from the characteristics group consisting of shared common source, shared common direction, and shared path convergence.*" (Emphasis added.) It is therefore respectfully submitted that amended Claim 7 clearly and precisely is distinguishable over the cited references in any combination. Hence, it is respectfully requested that the rejection of Claim 7 under 35 USC §102(b) as being unpatentable over Vaughn be withdrawn.

In view of the foregoing, it is apparent that the cited reference does not disclose, teach or suggest the unique combination now recited in amended Claim 7. It is therefore submitted that amended Claim 7 clearly and precisely distinguishes over the cited reference in a patentable sense, and is therefore allowable over this reference and the remaining references of record. Accordingly, it is respectfully requested that the rejection of Claim 7 under 35 U.S.C. § 102(b) as anticipated over Vaughn be withdrawn.

Claims 8-10 are dependent Claims that depend on and further limit amended Claim 7. Hence, for at least the aforementioned reasons, these Claims would be deemed to be in condition for allowance. Hence, it is respectfully requested that the rejections of the dependent Claims 8-10 also be withdrawn.

Claim 11 stands rejected under 35 U.S.C. §102(b) as anticipated over Vaughn. Applicant overcomes the rejection of Claim 11. Applicant contends that the rejection of amended Claim 11 is overcome for at least some of the reasons that the rejection of Claim 1 as amended is overcome. These reasons include Vaughn not disclosing, teaching, or suggesting "[a] means for grouping timing paths, *wherein groupings are selected from the characteristics group consisting of* shared common *source, shared common direction, and shared path convergence.*" (Emphasis added.) It is therefore respectfully submitted that amended Claim 11 clearly and precisely is distinguishable over the cited references in any combination. Hence, it is respectfully requested that the rejection of Claim 11 under 35 USC §102(b) as being unpatentable over Vaughn be withdrawn.

In view of the foregoing, it is apparent that the cited reference does not disclose, teach or suggest the unique combination now recited in amended Claim 11. It is therefore submitted that amended Claim 11 clearly and precisely distinguishes over the cited reference in a patentable sense, and is therefore allowable over this reference and the remaining references of record. Accordingly, it is respectfully requested that the rejection of Claim 7 under 35 U.S.C. § 102(b) as anticipated over Vaughn be withdrawn.

Claims 13-16 are dependent Claims that depend on and further limit amended Claim 11. Hence, for at least the aforementioned reasons, these Claims would be deemed to be in condition for allowance. Hence, it is respectfully requested that the rejections of the dependent Claims 13-16 also be withdrawn.

Claim 14 stands rejected under 35 U.S.C. §102(b) as anticipated over Vaughn. Applicant traverses the rejection of Claim 14. Applicant contends that the rejection of Claim 14 is traversed for at least some of the reasons that the rejection of Claim 4 is traversed. These reasons include Vaughn not disclosing, teaching, or suggesting "wherein the means for grouping timing paths that

share common characteristics uses wild cards to group the timing paths." It is therefore respectfully submitted that Claim 14 clearly and precisely is distinguishable over the cited references in any combination. Hence, it is respectfully requested that the rejection of Claim 14 under 35 USC §102(b) as being unpatentable over Vaughn be withdrawn.

In view of the foregoing, it is apparent that the cited reference does not disclose, teach or suggest the unique combination now recited in Claim 14. It is therefore submitted that Claim 14 clearly and precisely distinguishes over the cited reference in a patentable sense, and is therefore allowable over this reference and the remaining references of record. Accordingly, it is respectfully requested that the rejection of Claim 14 under 35 U.S.C. § 102(b) as anticipated over Vaughn be withdrawn.

Applicants have now made an earnest attempt to place this Application in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request full allowance of Claims 1-16.

Applicant does not believe that any fees are due; however, in the event that any fees are due, the Commissioner is hereby authorized to charge any required fees due (other than issue fees), and to credit any overpayment made, in connection with the filing of this paper to Deposit Account No. 50-0605 of CARR LLP.

Should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the number listed below.

Respectfully submitted,

CARR LLP

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